

OCT 28 2014

**MEMORANDUM**

**SUBJECT:** Comments on the Health Assessment for the Clean Harbors LLC Property, Wichita, KS

**FROM:** Ann Durham Jacobs  
Human Health Risk Assessor  
ENSV/EAMB

**TO:** Chris Jump  
Remedial Project Manager  
AWM/RCAP

RCRA



534081

As requested, we have reviewed the Health Assessment for the Clean Harbors LLC Property, and are providing our comments with respect to its influence upon risks to human health and future corrective measures decisions. Should you have any further questions, please contact Ann Jacobs at x7930.

**Comments**

The risk assessment has three issues which limit the ability to review the entire document thoroughly or with much confidence as to determine potential human health risks, which are outlined below:

1. The risk assessment did not address Clean Harbor's own impact upon groundwater and relied upon a previous evaluation for the entire aquifer. While existing groundwater use restrictions may be in place, institutional controls, such as groundwater use restrictions, cannot be used to eliminate a future exposure pathway. In order to determine Clean Harbor's potential contribution to ground water contamination and site risks for potential receptors, the groundwater must be quantitatively evaluated given the need to preserve future ground water use.
2. The soil data that were used for the risk assessment was incomplete and only included data from 2013 and did not include all appropriate existing soil data across all potential exposure areas. Without a complete set of all existing soil data from all potential exposure areas, it is not possible to determine baseline risk for all potential receptors onsite.

CONCURRENCE: Edie:7803:110114:H:/EAMB/AnnJacobs/AbbottRevRBOs.docx				
DIV/BR	ENSV/EAMB	ENSV/EAMB		
NAME	Jacobs	Beringer		
DATE	10/28/14	10/28/14		
INITIALS	ADJ	AWB (acting)		

3. The risks for potential exposure to site soil were not evaluated with the most current Regional Screening Levels or most current exposure factors. Given the incomplete soil data set along with evaluations not using the most current RSLs, the current risk calculations do not reflect accurate reasonable maximum exposures for the site.